

### **REMARKS / DISCUSSION OF ISSUES**

Claims 1, 3 – 11 and 15 are pending in the application. Claims 1, 11 and 15 are independent.

In the present response, the claims are not amended.

#### **35 U.S.C. 103**

The Office Action rejects claims 1, 3 – 6, 8, 11 and 15 under 35 U.S.C. 103(a) over Iverson et al. (US Patent 5,852,664, hereinafter Iverson), in view of Hampapur et al. (US 2001/0003468 A1, hereinafter Hampapur) and further in view of Davis (US Patent 5,907,619).

Applicants submit that for at least the following reasons, claims 1, 3 – 6, 8, 11 and 15 are patentable over Iverson, Hampapur and Davis, either singly or in combination.

For example, claim 1, in part, requires:

*"calculating a separate hash word from said parameters for each time frame; and*

*deriving a hash function by a concatenation of the hash words."*

(Emphasis added)

In the Office Action, page 4, the Office conceded that Iverson in view of Hampapur fails to disclose: calculating a separate hash word from said parameters for each time frame; and deriving a hash function by a concatenation of the hash words. However, the Office alleged that Davis, column 6, lines 32 – 35, teaches the above claimed features. Applicants respectfully disagree.

Davis, column 6, lines 32 – 36, recites:

"Each section is individually hashed to create a unique corresponding digest (Step 416). These digest sections are concatenated or otherwise combined to form a hash sequence

table (Step 420). The hash sequence table is digitally signed (Step 424)." (Emphasis added)

Clearly, from the above passage, Davis only teaches that each section is individually hashed. However, each section as defined by Davis in the paragraph at column 6, lines 20 – 32, does not correspond to each time frame:

"FIG. 5 is a flow chart diagram of the steps taken in one embodiment of the SCSD. First, an image frame is transmitted to the SCSD from other circuitry, possibly from circuitry within the hardware barrier (Step 404). Next, the captured image frame is subsequently compressed (Step 408). In one embodiment, the compression of the image frame generates a set of coefficients. In Step 412, the coefficients representing the compressed image are divided into sections. The coefficients in a particular section are usually interrelated, for example, a section may have all the high order coefficients necessary to generate a low resolution image." (Emphases added)

Therefore, in Davis, the different sections correspond to different coefficients of a compressed image. Thus, all these different sections are related to a particular image frame. Applicants submit that each section of Davis does not correspond to each time frame, because all the different sections correspond to only a single image frame. Thus the different hash words generated and the hash function derived in Davis correspond only to a single image frame. Davis does not disclose concatenating different hashed sections from different time frames. Therefore, Davis also fails to teach or suggest the above claimed features.

In view of at least the foregoing, Applicants submit that claim 1 is patentable over Iverson, Hampapur and Davis, either singly or in combination.

Independent claim 11, in part, also requires:

*"calculating a separate hash word from said parameters for each time frame; and*

*deriving a hash function by a concatenation of the hash words."*

Furthermore, independent claim 15, in part, requires:

*"calculating a separate hash word from said parameters for each time frame; and*

*deriving a hash function by a concatenation of the hash words."*

Applicants essentially repeat the above arguments for claim 1, and apply them to claims 11 and 15, pointing out why the combined teachings of Iverson, Hampapur and Davis fail to teach the above claimed features. Therefore, for at least the above reasons, claims 11 and 15 are patentable over Iverson, Hampapur and Davis, either singly or in combination. Claims 3 – 6 and 8 depend from and inherit all the features of claim 1. Therefore, claims 3 – 6 and 8 are patentable for at least the reasons discussed above with respect to claim 1, with each claim containing further distinguishing features.

Under 35 U.S.C. 103(a), the Office Action rejects claim 7 over Iverson, in view of Hampapur and Davis, and further in view of Makiyama et al. (US Patent 6,687,409 B1); claim 9 over Iverson, in view of Hampapur and Davis, and further in view of Krapp et al. (US 2002/0169934 A1); and claim 10 over Iverson, in view of Hampapur and Davis, and further in view of Levine (US Patent 6,266,644 B1).

Applicants submit that none of the cited additional references can in any way cure the deficiencies pointed out above in the combination of Iverson, Hampapur and Davis with respect to claim 1. Claims 7, 9 and 10 depend from and inherit all the features of claim 1. Thus, claims 7, 9 and 10 are patentable for at least the reason that they depend from claim 1, with each claim containing further distinguishing features.

Withdrawal of the rejection of claims 1, 3 – 11 and 15 under 35 U.S.C. §103(a) is respectfully requested.

**Conclusion**

In view of the foregoing, Applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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